

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JEAN-ROBERT CADET,
PLAINTIFF

CASE NO. C-1-01-131
(HOGAN, M.J.)

VS.

MADEIRA CITY SCHOOL DISTRICT
et. al.,
DEFENDANTS

2003 OCT 15 PM 1:47
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
KENNETH J. MURPHY
CLERK
FILED

SPECIAL INTERROGATORIES

Racial Harassment/Hostile Environment

- 1) Has the Plaintiff proven, by the preponderance or greater weight of the evidence that he was subjected to unwelcome harassment?

Yes ✓ No _____

If your answer to this Interrogatory is Yes, proceed to Interrogatory No. 2.
If your answer to this interrogatory is No, go to Interrogatory No. 7.

- 2) Has the Plaintiff proven, by the preponderance or greater weight of the evidence that, but for his race, he would not have been the object of harassment?

Yes ✓ No _____

If your answer to this Interrogatory is Yes, proceed to Interrogatory No. 3.
If your answer to this interrogatory is No, go to Interrogatory No. 7.

3. Has the Plaintiff proven, by the preponderance or greater weight of the evidence that the harassment unreasonably interfered with the terms and conditions of his employment?

Yes _____ No ✓

If your answer to this Interrogatory is Yes, proceed to Interrogatory No. 4.
If your answer to this interrogatory is No, go to Interrogatory No. 7.

4. Has the Plaintiff proven, by the preponderance or greater weight of the evidence that the harassment created a work environment that was both objectively and subjectively hostile or abusive?

Yes _____ No _____

If your answer to this Interrogatory is Yes, proceed to Interrogatory No. 5.
If your answer to this interrogatory is No, go to Interrogatory No. 7.

5. Has the Plaintiff proven, by the preponderance or greater weight of the evidence that defendants knew or should have known of the racial harassment and failed to implement prompt and appropriate corrective action?

Yes _____ No _____

If your answer to this Interrogatory is Yes, proceed to Interrogatory No. 6.
If your answer to this interrogatory is No, go to Interrogatory No. 7.

6. Has the Plaintiff proven, by a preponderance or greater weight of the evidence that the corrective action implemented by defendants exhibited such indifference as to indicate an attitude of permissiveness that amounts to discrimination?

Yes _____ No _____

Go to Interrogatory No. 7.

Race Discrimination/ Disparate Treatment

7. Has the Plaintiff proven, by the preponderance or greater weight of the evidence, that defendant Board intentionally discriminated against him on the basis of his race?

Yes _____ No ✓

Go to Interrogatory No. 8.

8. Has the Plaintiff proven, by the preponderance or greater weight of the evidence, that defendant Mate intentionally discriminated against him on the basis of his race?

Yes _____ No ✓

Go to Interrogatory No. 9.

9. Has the Plaintiff proven, by the preponderance or greater weight of the evidence, that Defendant Imhoff intentionally discriminated against him on the basis of his race?

Yes _____ No ✓

Go to Interrogatory No. 10.

10. Has the Plaintiff proven, by the preponderance or greater weight of the evidence, that Defendant Board retaliated against him for complaining of discrimination?

Yes _____ No ✓

Go to Interrogatory No. 11.

11. Has the Plaintiff proven, by the preponderance or greater weight of the evidence, that Defendant Mate retaliated against him for complaining of discrimination?

Yes _____

No

Go to Interrogatory No. 12.

12. Has the Plaintiff proven, by the preponderance or greater weight of the evidence, that Defendant Imhoff retaliated against him for complaining of discrimination?

Yes _____

No

Go to Interrogatory No. 13.

13. What amount, if any, do you award Plaintiff for back Pay?

\$ 0

Go to Interrogatory No. 14.

14. What amount, if any, do you award Plaintiff for Front Pay?

\$ 0

Go to Interrogatory No. 15.

15. What amount, if any, do you award Plaintiff for Compensatory Damages?

\$ 0

Please Sign the Verdict Form and inform the Courtroom Deputy that you have reached a verdict.

ALL JURORS MUST SIGN THE VERDICT

Rex C. Dunn

Debbie A. Hall

Dawn Winkward

Jerry R. French

Paul Stevens

Don-Di Ch

Kathy Evans

Date: 10/15/03

Foreperson:

Janice Kuthan